

To: Cheryl Niemi
Washington State Department of Ecology
Water Quality Program
P.O. Box 47600, Olympia, WA 98504-7600
swqs@ecy.wa.gov

From:
Gaythia Weis
InfoPteryx LLC
Bellingham WA 98229

March 23, 2015

Dear Cheryl Niemi,

I believe that most people want good jobs AND good health AND a healthy environment in which to live. One in which our grandchildren will still have the opportunity to live on the shores of the Salish Sea and to observe marine life, such as Orca Whales. Water Quality is important to Washington.

Environmental regulations ensure that one entity's profits are not taken at the expense of the well-being of others. This is quite compatible with industrial development. In addition to good industrial jobs, additional employment will still be available in fisheries, tourism, and ecological monitoring. The Environmental Protection Agency, was founded under the Nixon Administration. The Clean Water Act is not actually a radical idea.

The fish consumption rate needs to be set to be protective of those members in the population that are high fish consumers. <https://fortress.wa.gov/ecy/publications/publications/1209058.pdf>

In my opinion, a serious point of concern here in the way that the water quality standards are currently proposed, is that acceptable cancer risks would be INCREASED by a factor of 10, from 1 cancer case in a million to one in 100,000. The two metrics, fish consumption rate, and acceptable cancer rate, work together hand in hand to regulate water quality. And thus, I believe that it is not really true that raising the fish consumption rate would lead to significantly more stringent controls on pollution. That is because the state is proposing to simultaneously increase the acceptable cancer risk. The state would simply be saying that they are willing to accept that some people eat more fish, but balancing that by accepting that more cancers would occur as a result.

Additionally, according to <http://www.ecy.wa.gov/water/standards/Gov-Dec2014-ReducingToxicPollution.pdf>, once the most problematic toxic chemicals were identified, use of a chemical would be restricted only if a safer alternative is available. I believe that this is an unacceptable standard. Safety should be paramount.

In my opinion, the admission that there will be little economic impact from this change in regulations is

a clear indication that little improvement in water quality will actually occur. This is demonstrated by Page 41 of the Preliminary Cost Benefit and Least Burdensome Alternative Analysis, <https://fortress.wa.gov/ecy/publications/publications/1410056.pdf> which notes:

"After reviewing, filtering, and assessing real cases of existing effluent data for dischargers using existing analytical methods and permitting practices, we conclude that while it is theoretically possible for existing facilities to be impacted by a change in criteria values, based on the reasonable potential determination and resulting from the proposed rule amendments, no such existing facility will be impacted, based on the analysis we conducted."

The toxics reduction program proposed by Governor Inslee would be a step forward, but this should not come at the price of increasing the acceptable cancer risk for Washington citizens.

The cancer risk should remain set at one in a million.

Sincerely,

Gaythia Weis